

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2004-6-G

IN THE MATTER OF:)	
)	
South Carolina Pipeline Corporation)	INTERROGATORIES OF
Annual Review of the Purchased Gas)	THE CONSUMER ADVOCATE
Adjustments and Gas Purchasing Policies)	(Set No. 1)
_____)	

Pursuant to S.C. Code Ann. § 37-6-601 et. seq., (1989 and Supp. 2002), and 26 S.C. Code Ann. Regs. 103-851 (1976 and Supp. 2002), this party of record and Intervenor, Elliott F. Elam, Jr., Acting Consumer Advocate for the State of South Carolina, hereby serves these Interrogatories upon South Carolina Pipeline Corporation (SCPC or Company) in Docket No. 2004-6-G and files the original and one (1) copy with the Honorable Bruce F. Duke, Executive Director of the South Carolina Public Service Commission.

IT IS HEREIN REQUESTED:

- A. That all information requested below, unless otherwise specified, be limited to the Company's South Carolina operations.
- B. That all information shall be provided to the undersigned in the format as requested.
- C. That all responses to the requests below be labeled using the same numbers as used herein.
- D. That if the requested information is found in other places or in other exhibits, reference not be made to those, but instead, that the information be reproduced and placed in the interrogatory response in the appropriate sequence.
- E. That any inquiries or communications relating to questions concerning clarifications of the data requested below be directed to the undersigned.

- F. That all exhibits be reduced to 8½" x 11" format.
- G. That the requested information be bound in ring binders (loose leaf notebook) or otherwise bound.
- H. That in addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each answer be indicated.
- I. That each of these Interrogatories be reproduced at the beginning of each of the responses.
- J. That the Company provide the Consumer Advocate two copies of the responses to these Interrogatories as soon as possible, but no later than **March 18, 2004** and provide one copy to:

Glenn A. Watkins
Technical Associates, Inc.
1051 East Cary Street Suite 601
Richmond, VA 23219

- K. If the response to any Interrogatory is that the information requested is not currently available, state when the information requested will be available.
 - L. These Interrogatories shall be deemed to be continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.
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- 1-1. Please provide audited annual financial statements for the last three years.
 - 1-2. Please provide all financial reports submitted to the S.C. Public Service Commission during the last three years.
 - 1-3. Please provide all monthly cost of gas computations provided to the S.C. Public Service Commission Staff for the period under review.
 - 1-4. Please provide a copy of Commission order numbers 89-222 and 83-873.

- 1-5. Please provide a copy of all Commission approved tariffs.
- 1-6. Please provide a copy of all contracts with customers for the sale or transportation of gas. For each contract, provide a copy of the Commission order approving such contract as applicable.
- 1-7. For the period under review, please provide the following monthly amounts for each ISP-
ISPR sales customer:
- (a) metered MCF;
 - (b) billed Dth;
 - (c) gas cost; (\$/Dth and total);
 - (d) margin; (\$Dth and total);
 - (e) true-ups;
 - (f) other non-tax revenue;
 - (g) total billed revenue;
 - (h) type(s) of alternative fuel;
 - (i) price of alternative fuel(s); and,
 - (j) use of gas (process, fuel stock, etc.).
- 1-8. For the period under review, please provide the following monthly amounts for each firm
sales for resale customer (sales):
- (a) metered MCF;
 - (b) billed Dth;
 - (c) gas cost (\$/Dth and total);
 - (d) margin (\$Dth and total);
 - (e) true-ups;
 - (f) other non-tax revenue; and,
 - (g) total revenue.
- 1-9. For the period under review, please provide the following monthly amounts for each firm
transportation customer:
- (a) metered MCF;
 - (b) billed Dth;
 - (c) balancing (Dth and dollars);
 - (d) demand charges (\$/Dth and total);
 - (e) commodity charges (\$/Dth and total);
 - (f) other non-tax revenue; and,
 - (g) total revenue.

- 1-10. For the period under review, please provide the following monthly amounts for each interruptible transportation customer:
- (a) metered MCF;
 - (b) billed Dth;
 - (c) balancing (\$/Dth and dollars);
 - (d) demand charges (\$/Dth and total);
 - (e) commodity charges (\$/Dth and total);
 - (f) other non-tax revenue; and,
 - (g) total revenue.
- 1-11. Please provide listing of all affiliates that provided services to SCPC for the period under review. In this response, provide an explanation of the service(s) provided.
- 1-12. For the period under review, please provide the following for all transactions, allocations, or charges to SCPC, and from SCPC involving affiliates of SCANA:
- (a) service to or from SCPC;
 - (b) name of affiliate;
 - (c) nature of service or product provided;
 - (d) units (as applicable);
 - (e) total charges; and,
 - (f) all invoices.
- 1-13. Please provide a complete and thorough explanation, with examples and exhibits as appropriate, showing how individual gas costs are aggregated, and assigned to sales for resale customers and ISP-R customers. Include in this response an explanation of any true-ups between estimated and actual usage and gas costs, and/or alternative fuels for purposes of gas cost recovery. Also explain the process and procedures the Company uses to nominate or estimate individual ISP-R gas volumes and alternative fuel prices.
- 1-14. Please explain the “Price Risk Adjustment” and for which customers this applies, and explain which customers this adjustment applies to.
- 1-15. For the period under review, please provide a detailed explanation of the benefits to ratepayers as a result of the Company’s hedging program(s). In this response, quantify the costs and benefits (savings) to ratepayers on a monthly and annual basis.

- 1-16. For the period under review, please provide a detailed itemization (including Dth amounts and costs) of all hedging including name of contracting party, and type of contract, agreement or instrument.
- 1-17. Please provide a glossary of all costs types and acronyms, (e.g., CSS, GSS, WSS, etc) use in the Company's gas cost calculations and reports.
- 1-18. Please define the following terms that appear in the monthly cost of gas computation reports provided to the S.C. Public Service Commission Staff, and identify which customers (classes) each term applies to as it relates to SCPC gas costs:
- (a) Weighted Average Cost of Gas;
 - (b) Price Risk Adjustment;
 - (c) Demand Cost of Gas-Industrial;
 - (d) Demand Cost of Gas-Resale;
 - (e) Plant Urquart Firm; and
 - (f) Pland Urquart Demand.

Elliott F. Elam, Jr.
Acting Consumer Advocate

Hana Pokorna-Williamson
Staff Attorney

By: _____
S.C. Department of Consumer Affairs
3600 Forest Drive
Post Office Box 5757
Columbia, S.C. 29250-5757
(803) 734-4189

March 8, 2004

CERTIFICATE OF SERVICE

This is to certify that I, Elliott F. Elam, Jr., have served this day the foregoing **Interrogatories of the Consumer Advocate (Set No. 1)** upon the persons named below, at the addresses set forth, by deposit in the United States mail, postage prepaid.

Mitchell M. Willoughby, Esquire
Willoughby & Hoefer, P.A.
P.O. Box 8416
Columbia, SC 29202-8416

Garrett A. Stone, Esquire
Brickfield, Burchette, Ritts & Stone, PC
1025 Thomas Jefferson St. NW 8th Floor
Washington, DC 20007

Scott Elliott, Esquire
Elliott & Elliott, P.A.
721 Olive Street
Columbia, SC 29205

March 8, 2004
Columbia, South Carolina